

JOHN E. KUHN, JR.
United States Attorney

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNT 1:</u>
) Violation of the Lacey Act
vs.) Vio. of 16 U.S.C. § 3372(a)(1)
) and 3373(d)(2); 18 U.S.C. § 2
MICHAEL LECAM,)
)
Defendant.)
)
)
)
)

I N F O R M A T I O N

The United States Attorney charges that:

GENERAL ALLEGATIONS

In the Endangered Species Act, 16 U.S.C. § 1531(a)(4)(F), Congress found and declared that the United States has pledged itself as a sovereign state in the international community to conserve to the extent practicable the various species of fish or wildlife and plants facing extinction pursuant to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”), which is an international treaty to prevent species from becoming endangered or extinct because of international trade. Under CITES, countries work together to regulate the international trade of animal and plant species and ensure that this trade is not detrimental to the survival of wild populations.

During all times relevant to this case, the Defendant, MICHAEL LECAM, operated a business, known as “Tidal Wave Aquatics,” for which he used the facilities of interstate commerce to advertise coral for sale. The Defendant sold some of the coral that he imported as charged in Count 1. The fish or wildlife referred to in Count 1 is coral imported into the District of Alaska.

COUNT 1

Beginning on or about June 8, 2018, and continuing until on or about August 20, 2018, in the District of Alaska and elsewhere, the Defendant, MICHAEL LECAM, did knowingly purchase, import, receive, acquire, and sell any fish or wildlife transported or sold in violation of any law or regulation of the United States, and should have known that the fish or wildlife were taken, possessed, transported, and sold in violation of, and in a manner unlawful under, any underlying law or regulation; to wit, by engaging in business as an importer of fish and wildlife without first having obtained permission from the Secretary of the United States Department of the Interior, and by failing to file any

declaration or report required by 50 C.F.R. § 14.61, as required by the Endangered Species Act, 16 U.S.C §§ 1538(d)(1), (e), and (g).

All of which is in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(1) and § 3373(d)(2), and 18 U.S.C. § 2.

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s/ Jonas M. Walker
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